

OFFICES OF FREDERICK P. HAFETZ LLC

ATTORNEYS AT LAW

10 EAST 40TH STREET, 48TH FLOOR
NEW YORK, N.Y. 10016
TELEPHONE: (212) 997-7400
TELECOPIER: (212) 997-7646

MEMO

September 8, 2020

VIA ECF

Hon. Kenneth M. Karas
United States District Judge
United States District Court
Southern District of New York
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: United States v. Gabriel Letizia Jr.,
19-CR-548 (KMK)

Dear Judge Karas:

I represent Defendant Letizia in the above entitled case. Defendant's pretrial motions are due on September 15. I am writing to the Court to request permission to file an oversize brief. My brief in support of the pretrial motion will be approximately 45 pages.

The brief I am filing is in support of a motion to suppress all evidence obtained pursuant to searches made during the investigation of this case. There were seven search warrants issued in this case over a two-month period. In addition, there were also searches conducted without warrants. Our brief deals with many issues concerning these searches, including: authorization of general warrants; lack of probable cause in several of the warrants; impropriety in the execution of the warrants; and the appropriate remedy for violation of Defendant's constitutional rights.

I would greatly appreciate the Court permitting me to file a pretrial motion brief of 45 pages in length.

Granted.

So Ordered.



cc: All counsel (via ECF)

9/8/20

Respectfully submitted,

S/S

Frederick P. Hafetz